

1 VI-D-9. And I'm looking -- we'll be looking at Test IV-1-2.

2 Do you have that?

3 A (Witness Weeks) IV-1-2; yes.

4 Q And that runs over onto the next page, Roman VI-D-
5 10. Do you have that?

6 A (Witness Weeks) Yes, we do.

7 Q Now, looking at page Roman VI-D-10, if you look
8 down probably the lower half of the comment column on that
9 page, there was a -- an issue or a problem that was revealed
10 in the performance of this test. Would you -- is that a
11 fair general statement?

12 A (Witness Weeks) I believe you're referring to the
13 paragraph that starts, "Initially KCI was unable to match"?

14 Q Yes.

15 A (Witness Weeks) I see that paragraph.

16 Q And is it a fair description of the issue that is
17 discussed there that the credits on a bill were being
18 formatted with negative signs, and the system was reading
19 the amounts within those parentheses as a zero; is that a
20 fair statement?

21 A (Witness Weeks) Yes, that's fair.

22 Q And so, because of this problem, a bill would be
23 overstated because what should have been recognized as a
24 credit was simply being recognized as a zero amount; fair
25 statement?

1 A (Witness Weeks) I believe that's correct.

2 Q Now, this -- this particular test resulted in a
3 "satisfied" result; is that accurate?

4 A (Witness Weeks) Yes.

5 Q And is it also accurate to say that the
6 "satisfied" that was given to this test resulted from a
7 determination that BellSouth, quote, "will," unquote update
8 its procedures to accurately reflect credits; is that a fair
9 statement?

10 A (Witness Frey) Just for the record, we want to
11 point out that this is actually a metrics test, so we've
12 asked Mr. Freundlich to join us up here again. It's a
13 metrics test that was conducted based on the organization of
14 the MTP within the billing domain.

15 Q Okay. Let me -- let me repeat my question so
16 whoever's appropriate can answer it.

17 Is it accurate to say that the "satisfied" result
18 that was given on this test came about because of a KCI
19 determination that BellSouth, quote, "will," unquote, update
20 its procedures to eliminate the problem that's discussed?
21 Is that a fair statement?

22 A (Witness Weeks) That's not completely accurate.
23 That's only partially accurate.

24 Q Will you please make it accurate for me.

25 COMMISSIONER BURGESS: Identify yourself for the

1 record, please.

2 WITNESS FREUNDLICH: Yes. This is Lawrence
3 Freundlich.

4 A (Witness Freundlich) BellSouth reran their SUM
5 report for January 2001 and the values that were in this
6 rerun report matched our calculations. I believe -- well,
7 BellSouth also -- I'm sorry. KCI has also reviewed
8 BellSouth's report for February 2001, and the values there
9 matched as well. BellSouth -- BellSouth had a manual fix in
10 place, essentially, monitoring the raw values, particularly
11 the revenues for this metric and -- to determine that
12 parentheses were not used until or -- basically until the
13 electronic fix and PMAP was in place.

14 Q And to your knowledge, is that electronic fix in
15 place today?

16 A (Witness Freundlich) I don't know the answer to
17 that question. I don't know.

18 Q So then is it fair to say that the closure -- or
19 not the closure, but the determination of "satisfied" was
20 based on the determination that BellSouth will make this
21 electronic fix at some point in the future?

22 A (Witness Weeks) No, I think the "satisfied" was
23 based upon the fact that BellSouth instituted procedures in
24 their metrics reporting that would catch and trap and
25 correct this error. And then, on top of that, they've

1 chosen to automate that process instead of having that
2 process be a manual one.

3 Q Has that automated process been tested by KCI?

4 A (Witness Weeks) As we've just stated, no.

5 Q Let me ask you to turn over to page Roman VI-E-1.

6 A (Witness Weeks) Okay.

7 Q And this test deals with certain types of billing
8 information that's being generated, known as -- in the
9 acronyms CRIS and CABS. Is that -- is that accurate?

10 A (Witness Weeks) Yes, that's a documentation test.

11 Q And the purpose of the CRIS and CRABS -- CABS...

12 (Laughter)

13 Q Knew I was going to say that.

14 The purpose of the CRIS and the CABS invoices is
15 to send billing information to the CLEC regarding the usage
16 and the services that have been provided to the CLEC; fair
17 statement?

18 A (Witness Weeks) I think that's fair; yes.

19 Q And the usage that we're talking about is the
20 daily usage of a particular service by a -- by a user; fair
21 statement?

22 A (Witness Weeks) If by "usage" you're referring to
23 daily usage fees, that would be a characterization of the
24 DUF files.

25 Q Okay. Describe for me the information, then, that

1 appears on these types of bills.

2 A (Witness Weeks) Well, the billing elements --
3 there are a variety of different types of billing elements.
4 Some have to do with usage, some do not. Some are
5 recurring types of charges that one would see from period to
6 period; other types of charges are non-recurring, one-time
7 events, like installation charges and so on.

8 Q You mentioned the DUF file, the D-U-F.

9 A (Witness Weeks) Correct.

10 Q Is that what you were talking about?

11 A (Witness Weeks) Yes.

12 Q And the information that appears on a DUF, is that
13 a basis for what ultimately gets placed onto a CRIS or a
14 CABS bill?

15 A (Witness Weeks) Does not directly feed the bill.

16 Q Does information that appears on the DUF file --
17 is it a component in determining information that appears on
18 a CRIS or a CABS bill?

19 A (Witness Weeks) So the answer is yes. Through
20 certain internal processes at BellSouth, calls are made.
21 Those calls get logged, put onto the DUF files and sent to
22 the CLECs. They also find their way -- that same
23 information finds its way into usage based charges on the
24 bills.

25 Q Now, there were -- and referring specifically to

1 Test 5-1-1 on page Roman VI-E-5. And if you look at that
2 test and then the following several tests, V-2 -- excuse me,
3 V-1-2, V-1-3, and several of the tests in V-2, fair general
4 statement that those tests relate to the ability of a CLEC
5 to use a CRIS and a CABS bill from the standpoint that they
6 can understand what they're receiving?

7 A (Witness Weeks) Yes.

8 Q So it's essentially looking at documentation, and
9 seeing if that documentation conveys information that allows
10 the understanding of these bills?

11 A (Witness Weeks) Correct.

12 Q That's a fair statement?

13 Now, if you look, for example, at Test V-1-1 --
14 and I'm over on page Roman VI-E-6 -- you will see on that
15 page that in discussing the results of that test, that there
16 are certain qualifications that are set forth on that page
17 that relate to what KCI found when they reviewed
18 documentation. Fair statement of what's on page Roman VI-E-
19 6?

20 A (Witness Weeks) These are items that we noted
21 during the course of our document review that we chose to
22 share with the readers of this report.

23 Q And the report calls them "qualifications," does
24 it not?

25 A (Witness Weeks) Yes, it does.

1 Q Then if you turn over to -- or look at the next
2 page, Roman VI-E-7, the end result of that test is that the
3 qualifications regarding references in the BOS provided
4 documentation do not prevent CLECs from utilizing the
5 documentation in an acceptably efficient manner, do you see
6 that language?

7 A (Witness Weeks) Yes, that's how that paragraph
8 reads.

9 Q And is that -- is that language another example of
10 KCI's professional judgment?

11 A (Witness Weeks) Yes, it is.

12 Q And that professional judgment on this particular
13 test resulted in a "satisfied"; is that correct?

14 A (Witness Weeks) Yes, it did.

15 Q And that same process of identifying certain
16 qualifications and concluding that those qualifications did
17 not merit a result other than "satisfied" shows up in the
18 following test of V-1-3; is that correct?

19 A (Witness Weeks) That's correct.

20 Q And it shows up again in V-2-1?

21 A (Witness Weeks) That's correct.

22 Q And in V-2-2?

23 A (Witness Weeks) That's correct.

24 Q And in V-2-4?

25 A (Witness Weeks) That is correct.

1 Q In reaching the conclusion in each one of those
2 tests that we just looked at, that the qualifications noted
3 did not merit a result other than "satisfied," was there any
4 consultation with CLECs in Georgia?

5 A (Witness Weeks) No. We used our experienced
6 folks that have actually worked for ILECs and CLECs on our
7 teams, and our actual experience in trying to use this same
8 documentation to validate the bills and so on that were part
9 of the billing validation tests with which we gained enough
10 experience to form an opinion.

11 Q Let me ask you to turn back to Page VI-B-14.
12 Roman VI-B-14.

13 A (Witness Weeks) That's "B, bravo"?

14 Q That's correct. And if you need to, you can refer
15 back to the first page of this section. But this -- the
16 tests that are being run in this particular section that
17 we're looking at in 6-B relate to the DUF file that you were
18 referring to earlier?

19 A (Witness Weeks) Okay.

20 Q Would you -- is that a fair statement?

21 A (Witness Weeks) Yes.

22 Q Now, if you look at the first -- well, excuse me,
23 if you look at several of the tests that were conducted
24 regarding DUF files, and specifically we can start with II-
25 1-2 on page Roman VI-B-14.

1 A (Witness Weeks) I see II-1-2 on B-14; yes.

2 Q And the -- one of the purposes of this test was to
3 insure that the DUF files were reflecting all of the usage
4 that had occurred during a period of time; is that a fair
5 statement?

6 A (Witness Weeks) Yes. We made test calls, and
7 this was an attempt to determine whether the DUF files
8 properly reflected the files as we believe we had made them.

9 Q And if you look at II-1-10, it begins over on page
10 Roman VI-B-16.

11 A (Witness Weeks) Yes.

12 Q Similar test -- type of test to assess the proper
13 accumulation of usage data?

14 A (Witness Weeks) Yes. This is the process test as
15 opposed to the daily usage file test.

16 Q But it relates to -- it relates to usage data;
17 fair statement?

18 A (Witness Weeks) Yes, it does.

19 Q Then if you look at the very next test, II-1-11,
20 that once again relates to usage data?

21 A (Witness Weeks) Yes.

22 Q Now, if you go back to the first of these tests
23 that we were looking at, II-1-2, and I'm on page Roman VI-B-
24 15.

25 A (Witness Weeks) Yes.

1 Q If you look down there -- if you look at the
2 second to last paragraph in that -- in the "Comments"
3 section on Test II-1-2, it states that there were issues
4 regarding the accumulation of all of the usage data, and
5 that there were some inaccuracies, is that a fair general
6 statement?

7 A (Witness Weeks) What's the beginning of the
8 paragraph you're referencing?

9 Q "BLS updated its billing documentation."

10 A (Witness Weeks) I see that.

11 Q Would you agree a fair generalization is that
12 there were -- there were problems found in the accumulation
13 of all usage data.

14 A (Witness Weeks) I think this is characterizing a
15 problem with documentation, not a problem with behavior.

16 Q Okay. Would it be fair to say, though, that the
17 comment here has to do with whether all of the usage has
18 been gathered so that it can be transferred to the CLEC for
19 billing purposes?

20 A (Witness Weeks) Our recollection on this is that
21 the business issues related here were that service orders
22 were hung up in the system, preventing usage from being
23 delivered in the DUF files.

24 Q And, despite that finding, this particular test
25 resulted in a "satisfied" categorization; correct?

1 A (Witness Weeks) This characterize -- II-1-2 is
2 satisfied; correct.

3 Q And it would be fair to say that the basis for why
4 this particular test resulted in a -- in a "satisfied"
5 conclusion is that, as stated near the bottom of the test or
6 the comments on the test, that KCI understands that the CLEC
7 will not be billed for any usage not delivered during this
8 period of time; do you see that?

9 A (Witness Weeks) I don't think that's the basis
10 for our "satisfied." That's just a piece of information
11 that, had we been a real CLEC operating, we would not have
12 been billed for the usage during this period.

13 Q Well, what was the basis, then, for determining
14 "satisfied" with the existence of the -- of the problem that
15 you just described?

16 A (Witness Weeks) Yeah. The standard that we used
17 in this test was such that 94 percent compliance was
18 sufficient to merit a "satisfied."

19 Q The comment about the usage that is not -- has not
20 been accumulated will not be billed to the CLEC, in your
21 opinion, would that have any negative impact on the CLEC?

22 A (Witness Weeks) Not that I can think of.

23 Q The CLEC doesn't get the usage, the CLEC can't
24 bill the customer and obtain revenue; isn't that correct?

25 A (Witness Weeks) So the question you're asking, if

1 I understand it, is had the usage not been delivered, which
2 it was not in this case, what would have been the impact on
3 the CLEC? And the answer is: The CLEC would not have been
4 able, in turn, to bill the customer for that usage, so
5 there's lost revenue. And they also would not have been
6 billed by the ILEC for that, so there would have been lost
7 costs. So the net effect would be whatever margin there was
8 on the difference between what they billed the customer, if
9 they billed for usage, and what they were billed for that
10 usage by the company.

11 Q And when you use the term "margin," you would
12 include, in the term "margin," profit?

13 A (Witness Weeks) Yes.

14 Q And this concept of the -- of the BellSouth not
15 billing the CLEC for usage is also found in the -- in the
16 two other tests that we looked at in this section, and
17 specifically II-1-10?

18 A (Witness Weeks) I think that's fair; yes. And
19 as -- and as it points out in 10, this is not an absolute
20 missing set of records, this is a delayed set of records.
21 In other words, the files -- the DUF files weren't in the
22 files that we expected them to be in. They appeared
23 subsequently in later DUF files.

24 Q And do you have any experience in consumer
25 reaction to receiving bills for late -- receiving bills for

1 services that should have been billed previously?

2 A (Witness Weeks) Yes.

3 Q And what is that reaction?

4 A (Witness Weeks) Usually they're not very happy.

5 Q Now, if you turn to page Roman VI-A-24. Roman VI-
6 A-24. And at the top of that page you should see Test I-1-
7 20. Do you see that?

8 A (Witness Weeks) Yes.

9 Q And this -- this test addresses timeliness of
10 bills; fair statement?

11 A (Witness Weeks) Yes.

12 Q And if you look in the comment column, there is a
13 standard that is used or discussed in that comment column of
14 six business days or in eight calendar days; do you see
15 that?

16 A (Witness Weeks) Yes, I see that reference.

17 Q And do you know what the basis for using those
18 standards was?

19 A (Witness Weeks) It's the September 2000 SQM
20 standard by the Georgia PSC.

21 Q Now, was there any assessment made as to whether
22 that SQM represented a figure that would demonstrate parity
23 with retail?

24 A (Witness Weeks) Okay, there was no retail analog
25 specified in the SQMs for UNE. So there was not a retail

1 parity issue in this particular one.

2 Q And when you say there was not a retail parity
3 issue, what do you mean by that?

4 A (Witness Weeks) The standard did not articulate
5 parity with retail for UNE as being part of the definition
6 of the standard.

7 Q But assessing parity between what BellSouth's
8 customers experience and what a CLEC's customers experience
9 is -- would you agree that that's a definition of "parity"?

10 A (Witness Weeks) UNE products are not available
11 through the BellSouth retail distribution channel.

12 Q Okay. Do you know what the Commission's order
13 specified as the benchmark for billing?

14 A (Witness Weeks) It's the numbers included here in
15 this comment report.

16 Q For purposes of the billing tests, a test bed was
17 used; is that correct?

18 A (Witness Weeks) For portions of it; yes.

19 Q And for what portions was a test bed not used?

20 A (Witness Weeks) Documentation tests, for example.

21 Q But when you ran tests, a test bed was used; is
22 that a fair statement?

23 A (Witness Weeks) When we did ordering to get
24 accounts into a certain state, there were transactions run.
25 When we made calls, there was daily usage generated. We

1 looked at whether or not the bills reflected properly the
2 billing elements that should be there, given the order
3 activity and the usage and the other types of charges that
4 were appropriate.

5 Q Now, when the test bed was used for billing
6 purposes, that test bed was constructed specifically for the
7 billing test; is that a fair statement?

8 A (Witness Weeks) I think that's fair.

9 Q And it was not the test bed that was used for pre-
10 ordering, ordering, and provisioning; is that a fair
11 statement?

12 A (Witness Weeks) That would be true for UNEs.

13 Q Okay. And in that situation where you're using a
14 separate test bed for billing versus the -- strike that.
15 Let me rephrase it.

16 In the world that a customer would experience,
17 that customer would place an order, and it would be
18 provisioned, and that customer would be ordered, and it
19 would flow through one system; fair statement?

20 A (Witness Weeks) No, there would be many systems
21 that those orders would flow through.

22 Q Okay. But it would be within BellSouth's systems
23 for taking an order, getting it into its system,
24 establishing a customer, and then billing that customer?

25 A (Witness Weeks) Yeah. I guess I'm struggling a

1 little bit with the question. Yes, BellSouth's systems
2 would need to be used by a CLEC to do all of the electronic
3 types of things surrounding pre-ordering, ordering,
4 provisioning, billing, maintenance and repair, and so on.

5 Q And the information that is in BellSouth's systems
6 because of the pre-ordering and ordering and provisioning
7 process, there are aspects of that information that are used
8 for billing purposes, such as address; fair statement?

9 A (Witness Weeks) There are multiple systems at
10 BellSouth that contain address information. Some of those
11 systems are used by ordering, some of them are used by
12 billing. There's more than one database with addresses over
13 there.

14 Q Well, the information that you used to do billing
15 testing -- and I'm talking about the billing testing now --
16 was not the information -- not the test accounts that were
17 used for testing, pre-ordering, ordering, and provisioning;
18 is that a fair statement?

19 A (Witness Weeks) For UNES, that's a true
20 statement.

21 Q That's all I have. Thank you.

22 MR. ROSS: No questions, Mr. Chairman.

23 COMMISSIONER BURGESS: Ms. Boone?

24 MS. BOONE: No, sir.

25 COMMISSIONER BURGESS: Mr. Atkinson?

1 MR. ATKINSON: No questions.

2 COMMISSIONER BURGESS: Mr. Hill, any redirect?

3 MR. HILL: No, sir.

4 COMMISSIONER BURGESS: This panel is excused.

5 We're moving on. Ready for the change management panel.

6 (Panel excused.)

7 COMMISSIONER BURGESS: Mr. Lemmer, are you ready
8 to proceed?

9 MR. LEMMER: I'm ready.

10 WITNESS WEEKS: Is it permitted, according to
11 procedure, to correct an answer?

12 COMMISSIONER BURGESS: A question hasn't been
13 asked.

14 (Laughter.)

15 COMMISSIONER BURGESS: Relative to what?

16 WITNESS WEEKS: We were asked whether or not the
17 same test bed was used for billing and for pre-ordering and
18 ordering, and the testimony that we gave is not 100
19 accurate. On the retest that we did -- not the initial
20 test, but on the retest we did, there were test-bed accounts
21 in common between the pre-ordering and ordering activities
22 and the billing activities.

23 COMMISSIONER BURGESS: Let me ask, Mr. Lemmer, is
24 there some follow-up questions that you would like to ask
25 based on that response?

1 MR. LEMMER: Thank you, Commissioner, no.

2 COMMISSIONER BURGESS: Okay. Thank you. With
3 that we will proceed.

4 FURTHER CROSS EXAMINATION

5 BY MR. LEMMER:

6 Q Gentlemen, change management. So we're on Section
7 8 of the report. Describe briefly for me what -- when we
8 talk about change management in the context of Section 8,
9 what are we talking about?

10 A (Witness Weeks) I think you could characterize
11 change management as a process test as opposed to some sort
12 of transaction test. It is attempting to determine whether
13 or not the practices in place by the company that govern how
14 it does change management changes of its interfaces visa a
15 via the interface specifications and what the capabilities
16 of those systems are get noticed out to parties and the
17 process surrounding defining what those would be, when they
18 will take place, how the -- the form of providing
19 documentation about those changes to the interface and those
20 sorts of things.

21 Q What is the -- in your opinion, what is the
22 importance of providing documentation to CLECs about
23 changes?

24 A (Witness Weeks) If CLECs are going to -- if the
25 ILEC is going to change its interface and the CLECs are to

1 take advantage of those changes or somehow be subjected to
 2 those changes, then they need to be made aware of those
 3 changes in advance if they're going to have time to react to
 4 those changes on their side of the wall and do whatever
 5 changes to business practices, software or anything else
 6 they need to do so that as the interface itself changes on
 7 the ILEC side, the CLEC is prepared to start doing business
 8 with that new interface.

9 Q So if I understand what you told me, one important
 10 aspect of change management is for the CLEC to have a clear
 11 understanding of the changes that the ILEC -- in this case
 12 BellSouth -- is intending to make. Is that a fair
 13 statement?

14 A (Witness Weeks) I think that's fair.

15 Q And that clear understanding has to be available
 16 within sufficient time for the CLEC to be able to do
 17 whatever modifications it might have to do internally to
 18 accommodate the changes; is that a fair statement?

19 A (Witness Weeks) I think that's fair.

20 Q Now at the point in time that KCI finished its
 21 testing or its review of change management, what was the
 22 state of BellSouth's change management procedures?

23 A (Witness Weeks) At the end of the test, the
 24 company was just coming out of a year long period of
 25 revision to its change control processes and procedures,

1 wherein it had taken input from the CLECs and was making
2 selective changes to the historical definition of that
3 process.

4 Q So it would be fair to say that the -- that
5 BellSouth's change management system was still evolving at
6 the point in time that your review concluded?

7 A (Witness Weeks) And continues through today to do
8 so.

9 MR. LEMMER: That's all I have. Thank you.

10 COMMISSIONER BURGESS: BellSouth.

11 MR. MCCALLUM: No questions.

12 COMMISSIONER BURGESS: Covad.

13 MS. BOONE: No questions.

14 COMMISSIONER BURGESS: Sprint.

15 MR. ATKINSON: No questions, Mr. Chairman.

16 COMMISSIONER BURGESS: Mr. Hill.

17 MR. HILL: No, sir.

18 COMMISSIONER BURGESS: This panel is dismissed.

19 We're moving right along.

20 (Panel excused.)

21 COMMISSIONER BURGESS: RSIMMS and Encore Systems
22 review and Systems Capacity Management is next. Mr. Barber,
23 are you ready to proceed?

24 MR. BARBER: Thank you, sir.

25 FURTHER CROSS EXAMINATION

1 BY MR. BARBER:

2 Q Good afternoon.

3 A (Witness Weeks) Good afternoon.

4 A (Witness Frey) Good afternoon.

5 Q One category of tests ordered by the Commission
6 were volume tests, correct?

7

8 A (Witness Frey) That's correct.

9 Q Can you explain what a regular volume test is in
10 our context?

11 A (Witness Weeks) It's an attempt to run volumes
12 through BellSouth interfaces at a level projected at some
13 date in the future to determine whether or not it appears
14 that those systems are capable of handling those volumes.

15 Q Could you explain what a peak volume test is?

16 A (Witness Weeks) A peak volume extends that
17 concept to recognize that not every day in the normal course
18 of business is in fact a normal day. That there are times
19 when the system will be subjected to much higher workloads
20 and that the peak volume test is an attempt to see how the
21 system behaves in the face of that higher volume.

22 Q All right. Finally, can you explain what a stress
23 volume test is, or a stress test?

24 A (Witness Weeks) A stress test historically would
25 have been an attempt to continuously escalate the volumes

1 you were placing through an interface, and if you were doing
2 it in the classic way, push it until it broke.

3 Q Did you run regular volume and peak-volume tests
4 on the OSS in this state?

5 A (Witness Weeks) We ran normal and peak volume
6 tests against the RSIMMS environment in this state.

7 Q I'm going to come back to RSIMMS. Did you run
8 stress tests?

9 A (Witness Weeks) No.

10 Q Did you do so in other states?

11 A (Witness Weeks) Yes, we have.

12 Q Why not in Georgia?

13 A (Witness Weeks) It was not in the scope of the
14 tests.

15 Q During the volume test that you did process, you
16 tested orders that were processed electronically, correct?

17 A (Witness Weeks) That's correct. A volume test is
18 electronically orderable flow-through orders.

19 Q So you performed no volume tests on the manually-
20 handled orders, correct?

21 A (Witness Weeks) By agreement in all of the
22 jurisdictions there's been limited stressing, if you will,
23 through volume at some future projected date of manual
24 processes at work centers and so on.

25 Q When electronically submitted orders enter

1 BellSouth's system, they are processed by computers, are
2 they not?

3 A (Witness Weeks) If they are designed to be flow-
4 through, they are sent electronically and if there are no
5 errors, then they would flow through in a fully mechanized
6 way back to the service order processor.

7 Q And this production system of BellSouth is called
8 the Encore System, is that correct?

9 A (Witness Weeks) I believe that's their acronym
10 for the production system environment.

11 Q You're going to have to bear with very bad
12 handwriting. The Encore System essentially is the
13 production system that CLECs would have to use to take
14 advantage of BellSouth's OSS, correct?

15 A (Witness Weeks) That's correct.

16 Q So can we agree that that's their production
17 system?

18 A (Witness Weeks) Yes.

19 Q Is one purpose of volume tests to make sure that
20 that system can handle reasonably foreseeable heavy traffic?

21 A (Witness Weeks) I think that's a fair assessment
22 of a volume test.

23 Q So, for instance, to determine whether or not
24 BellSouth's system wouldn't crash when consumers were
25 responding to a promotion, there was some other cause for

1 unusually heavy volume in the system?

2 A (Witness Weeks) No, I would characterize it as
3 the normal-day test, and the peak-day test would be designed
4 more for normal circumstances that are reasonably
5 anticipated, such as the regular flow of business or a busy
6 day. Say in a community where there's a large student
7 population and, you know, predictably all right the
8 beginning of a semester students would be placing a lot of
9 orders. So normal and peak would be targeted at reasonably
10 foreseeable events. if someone -- if there was an
11 extraordinary event, such as some sort of mass promotion,
12 that might not necessarily fit within the headroom that you
13 would expect to be able to demonstrate in a normal or a
14 peak-volume test.

15 Q And what you did here was to conduct normal and
16 peak-volume tests?

17 A (Witness Weeks) That's correct.

18 Q The volume tests you actually performed here
19 were not actually on BellSouth's Encore system, is that
20 correct?

21 A (Witness Weeks) The normal and peak were
22 RTSILMMS, as I talked about. There was a production system
23 volume test of lesser magnitude.

24 Q And sticking with the normal and peak tests,
25 rather than test the computers that the CLECs would have to

1 use, the ones they would have to rely on from BellSouth,
2 BellSouth set up an entirely separate system called RSIMMS,
3 isn't that right?

4 A (Witness Weeks) Well RSIMMS existed prior to the
5 notion of a volume test. It was actually used by BellSouth,
6 as I understand it, to do certain other testing of their
7 own, and the decision was made to execute the normal and
8 peak tests in the RSIMMS environment as opposed to the
9 Encore environment.

10 Q So when you say that, the normal and peak volume
11 tests were run in RSIMMS and not in the regular production
12 system, Encore?

13 A (Witness Weeks) That's a correct statement.

14 Q Can we agree that this will be called a test
15 system as opposed to a production system?

16 A (Witness Weeks) That's fine.

17 Q Who designed RSIMMS?

18 A (Witness Weeks) BellSouth -- I assume. BellSouth
19 or their contractors.

20 Q Do you know why BellSouth wanted the volume test
21 runs in RSIMMS instead of in Encore?

22 A (Witness Weeks) It was the representation
23 BellSouth made to us that they did not have the computing
24 capacity in the production environment to sustain the
25 workloads 18 months to two years hence.